

REMARKS

Claims 1 and 3 to 6 have been cosmetically amended and claims 9 to 21 have been canceled.

With reference to the objection to the drawings, it is noted that the “substrate tray having depressions therein with a substrate in each said depression, each depression having a hole” is shown in Figs. 3b, 3c and 4 and that element 410 is shown in Fig. 4. a copy of which is attached hereto.

Claims 1 to 7 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite. The rejection is respectfully traversed.

The fact that dimensions are not provided does not make a claim indefinite. The issue of dimensions does not appear in claim 1, so it is not understood why this claim is listed in the rejection. Accordingly, should the rejection be repeated, it is requested that the Examiner specifically point out what is alleged to be indefinite. In claim 2, dimensions are not required. All that is required is that the protrusions on the plate be of sufficient height to lift the substrates up off the bottom of the tray. This does not require dimensions. The same argument is present as to claim 3. Claims 4 and 5 requires dimensions of relative size and is therefore definite. The issue does not arise in claims 6 to 8.

Claims 1 to 7 were rejected under 35 U.S.C. 102(b) as being anticipated by Kiyokawa et al. The rejection is respectfully traversed.

Claim 1 requires the steps of providing a substrate tray having depressions therein with a substrate in each said depression, each depression having a hole and

providing and raising a plate with a plurality of protrusions, each protrusion extending through a different said hole and maintaining level or leveling the substrate in the corresponding depression while lifting said substrate concurrently with the other of the plurality of substrates in the other of said depressions. No such steps are taught or suggested by Kiyokawa et al. either alone or in the combination as claimed. In Kiyokawa et al., the substrate is item 4, the item with the depression and hole. However, the protrusion 14 does not enter the hole but rather appear to be a lifter for the substrate 4. It follows that this feature is not only not shown by Kiyokawa et al., but it is not even suggested. There is no issue of leveling of a chip in Kiyokawa et al.

Claims 2 to 7 depend from claim 1 and therefore define patentably over Kiyokawa et al. for at least the reasons presented above with reference to claim 1.

In addition, claim 2 further limits claim 1 by requiring that the protrusions on the plate be of sufficient height to lift the substrates up off the bottom of the tray. No such step is taught or suggested by Bahnck et al. either alone or in the combination as claimed.

Claim 3 further limits claim 1 by requiring that the protrusions on the plate be of sufficient height to lift the substrates up off the bottom of the tray and over the depressions in which they lie. No such step is taught or suggested by Kiyokawa et al. either alone or in the combination as claimed.

Claim 4 further limits claim 1 by requiring that the holes in the tray be sufficiently sized to permit the protrusions to come through the bottom of the tray. No such step is taught or suggested by Kiyokawa et al. either alone or in the combination as claimed.

Claim 5 further limits claim 4 by requiring that the holes in the tray be sufficiently small to prevent the substrates from falling through. No such step is taught or suggested by Kiyokawa et al. in the combination as claimed.

Claim 6 further limits claim 1 by requiring that the method further include the step of raising the lifting device out of the tray after applying the vacuum. No such step is taught or suggested by Kiyokawa et al. either alone or in the combination as claimed.

Claim 7 further limits claim 1 by requiring that the protrusions be arranged in a two-dimensional array on the plate. No such step is taught or suggested by Kiyokawa et al. in the combination as claimed.

Claim 8 was rejected under 35 U.S.C. 103(a) as being unpatentable over Kiyokawa et al. in view of Canella (U.S. 6,135,291). The rejection is respectfully traversed.

The arguments applied above with reference to the rejection of claim 1 applies as well to this rejection since Canella fails to overcome the deficiencies in Kiyokawa et al. as enumerated above with reference to claim 1.

In addition, claim 8 further limits claim 1 by requiring that the protrusions be arranged in a linear array on a strip and a plurality of strips be joined to form the plate. No such step is taught or suggested by the applied references in the combination as claimed.

In view of the above remarks, favorable reconsideration and allowance are respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jay M. Cantor".

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